

ADAM GILL, ESQ.
Nevada Bar No. 11575
RICHARD HARRIS LAW FIRM, LLP.
801 S. 4th St.
Las Vegas, Nevada 89101
(702) 333-3333
(702) 444-4466 (Fax)
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
NICHOLAS FRANCIS BURNS,)
)
Defendant.)
)
_____)

Case No.: 2:23-mj-141-EJY

Stipulation Requesting Case be Closed

IT IS STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Imani Dixon, Assistant United States Attorney, counsel for the United States of America, and Adam Gill, Esq., counsel for the defendant, that the status hearing in the above-captioned matter, be closed.

This Stipulation is entered into pursuant to General Order 2007-04 and based upon the following:

1. The Defendant completed the DUI school, the Victim Impact Panel, and the Eight-hour Alcohol Awareness class as required.
2. Defendant paid the \$500.00 fine as well as the \$10.00 assessment fee.
3. Defendant has completed all required conditions imposed by the Court. The parties agree to jointly move to allow the defendant to withdraw his plea of guilty to Count 1 – Operating a Motor Vehicle while Under the Influence of Alcohol.
4. The Government hereby moves, pursuant to the plea agreement to amend Count 1 of the Complaint to a charge of Reckless Driving, a violation of Title 36 C.F.R. § 4.2(b) and NRS 484B.653.

1 5. The Defendant hereby pleads guilty to the Amended Count 1 of the
2 Complaint.

3 6. The parties jointly request that the original sentence be applied to the
4 Reckless Driving conviction.

5 DATED this 31st day of JANUARY 2024

6
7 RESPECTFULLY SUBMITTED BY:

8 /s/ Imani Dixon
9 Imani Dixon, ESQ.
10 Assistant United States Attorney

/s/ Adam Gill
 Adam Gill, ESQ.
 Attorney for Jose Alberto Cortez

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

NICHOLAS FRANCIS BURNS,)

Defendant.)

Case No.: 2:23-mj-141-EJY

Order to Close the Case

Based on the pending stipulation of counsel, and good cause appearing therefore,
the Court finds that:

1. Defendant Jose Alberto Cortez has successfully completed the conditions of his sentencing.

ORDER

IT IS HEREBY ORDERED that Count One is amended to Reckless Driving in violation of 36 C.F.R § 4.2 and N.R.S. 484B.653;

IT IS FURTHER ORDERED that the case be closed.

DATED this 31st day of January, 2024


UNITED STATES MAGISTRATE JUDGE